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April 6, 2017

VIA ELECTRONIC FILING

The Honorable Steve C. Mannion, U.S.M.J.
Martin Luther King, Jr. Federal Building &
United States Courthouse
Courtroom 3C
50 Walnut Street
Newark, New Jersey 07102

Re: David Mangan v. City of Newark, et al.
Civil Action No.: 2:15-cv-07282-SDW-SCM

Dear Judge Mannion:

This office represents Plaintiff, David Mangan, in the above-referenced matter. Per Your Honor's Order, and together with counsel for Defendants, Emilia Perez, Esq., please accept this joint agenda letter respectfully advising the Court of the issues to be addressed at the upcoming telephone conference scheduled for Tuesday, April 11, 2017.

As it currently stands, the depositions of defendants Detective Pablo Gonzales, Detective Feliberto Padilla, and Detective Emmanuel Miranda and Plaintiff David Mangan have been completed. The depositions of Lt. William Brady, Detective Lydell James, and Detective Peter Chirico have not occurred. Additionally, the deposition of witness Tahj Williams has also not occurred. The deposition was scheduled for March 30, 2017. However, Ms. Barnett became held up in criminal court and therefore this office had to cancel Mr. William's deposition at the last minute. The undersigned has been trying to reach out to Mr. Williams to reschedule his deposition for either May 1, 2017 or May 2, 2017. The parties are hopeful to be able to schedule a deposition for Mr. Williams shortly. Moreover, the City of Newark has served a second request for documents on Plaintiff.

As a result of the foregoing, the parties have not yet had the opportunity to engage in fruitful settlement discussions.

Thank you for your Honor's time and attention to this matter.

Respectfully Submitted,
BMB LAW FIRM

/s/ *Brooke Barnett*

BROOKE M. BARNETT

BMB/ds

cc: Emilia Perez, Esq. (Via ECF)